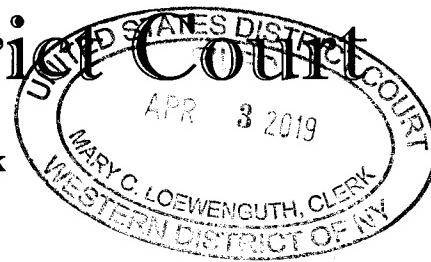


United States District Court  
for the  
Western District of New York



United States of America

v.

Case No. 19-MJ- 4047

THOMAS ALONZO BOLIN  
a/k/a Peter Vincent

*Defendant*

CRIMINAL COMPLAINT

I, ADAM T. PARADOWSKI, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about March 12, 2019, in the County of Monroe, in the Western District of New York, the defendant, THOMAS ALONZO BOLIN a/k/a Peter Vincent, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating to a Special Agent and Task Force Officers of the Federal Bureau of Investigation that he did not possess any firearms in New York State when the defendant then and there knew that he possessed a Mossberg, Model 590, 12-gauge shotgun in his bedroom at 34 Third Avenue, Rochester, New York, in violation of Title 18, United States Code, Section 1001(a)(2).

This Criminal Complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF SPECIAL AGENT ADAM T. PARADOWSKI.

Continued on the attached sheet.

Complainant's signature

S/A ADAM T. PARADOWSKI

*Printed name and title*

Judge's signature

HONORABLE MARIAN W. PAYSON  
UNITED STATES MAGISTRATE JUDGE

*Printed name and title*

City and State: Rochester, New York

19-NY-4047

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

State of New York )  
County of Monroe ) SS:  
City of Rochester )

I, ADAM T. PARADOWSKI, being duly sworn, depose and state the following:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have served in this capacity for approximately six months. I am currently assigned to the Joint Terrorism Task Force (JTTF), Buffalo Division, in Rochester, New York. At the JTTF, I work with a team of federal, state, and local law enforcement agents and officers on investigations relating to domestic and international terrorism. During my tenure with the FBI, I have also attended intensive training on counterterrorism and other types of investigations, including counterintelligence, white collar crime, public corruption, organized crime, and narcotics. Prior to my employment with the FBI, I worked for approximately five years as a Border Patrol Agent with the United States Customs and Border Patrol. In addition, I worked for approximately one year with New York State Department of Corrections and Community Supervision. I am familiar with digital evidence commonly possessed and used by those involved in criminal activities. I have also conferred with other FBI Special Agents who have expertise and experience in counterterrorism investigations and digital evidence.

2. The FBI is an agency within the executive branch of the government of the United States and is responsible for investigating alleged violations of federal criminal law, including, inter alia, violations of federal civil rights laws (including violations of 18 U.S.C. §§ 241 (conspiracy to violate civil rights), 247 (obstruction of persons in free exercise of religious beliefs),

and 249 (hate crime acts)), and federal firearms laws (including violations of 18 U.S.C. § 924(c) (possession and use of firearms in furtherance of a crime of violence)). Based on the above-described information, the FBI began an investigation of THOMAS ALONZO BOLIN a/k/a Peter Vincent and others for possible violations of federal civil rights and firearms laws.

3. This affidavit is submitted in support of a criminal complaint charging THOMAS ALONZO BOLIN a/k/a Peter Vincent with a violation of 18 U.S.C. § 1001(a)(2) (materially false statements in relation to a matter within the jurisdiction of the executive branch of the United States government). The assertions made herein are based on my personal knowledge and information I have received from this investigation, including information from several law enforcement officers and agents assigned to the Rochester Joint Terrorism Task Force (JTTF), records from BOLIN's Facebook account, and information from public databases, all of which are true and correct to the best of my knowledge and belief. Further, I have had discussions with law enforcement officers involved in this investigation who have confirmed the accuracy of the information contained within this affidavit. Since this affidavit is being submitted for a limited purpose, I have not included each and every fact that I know concerning this investigation. Rather, I have set forth only those facts that relate to the issue of whether probable cause exists to believe that BOLIN committed the above-mentioned offense.

## II. PROBABLE CAUSE

### FBI INVESTIGATION OF BOLIN

4. THOMAS ALONZO BOLIN is a 22-year old white male. He is a United States citizen, who until recently resided at 34 Third Avenue, Greece, New York. As detailed herein, BOLIN has expressed his support of white supremacist groups and self-identifies as a "Folk

Odinist.” Odinist refers to a religious group revering the gods of the Norse mythos. The designation of a “Folk” Odinist adds the additional condition that the Odinist religion is limited to heterosexual whites. As detailed herein, the FBI began an investigation of BOLIN and others for potential violations of federal civil rights and firearms laws in mid-March 2019.

5. On March 15, 2019, a gunman attacked two mosques in Christchurch, New Zealand, shooting and killing 50 worshippers and civilians, and injuring 50 others. The gunman – a self-professed ethno-nationalist – livestreamed the first attack on Facebook. In connection with the attacks, the gunman issued a 73-page manifesto titled, “The Great Replacement,” which is a reference to white genocide conspiracy theories. The manifesto was e-mailed to numerous recipients and links to the manifesto were shared on Twitter and other platforms. Copies of the livestream video were posted on various social media platforms, including Facebook and YouTube.

6. On March 15, 2019, a Facebook user by the name of “Ragnar Odinson” made threatening statements via Facebook Messenger. Odinson responded to the Christchurch attacks by calling for a re-enactment in the United States. Odinson further indicated that he was willing to “do something as of next week” in Baltimore, Maryland. Odinson encouraged another individual to buy firearms and ammunition, and food, and stated that he (Odinson) would travel to meet the individual the following week. Odinson, whose real name is Austin Witkowski, is BOLIN’s cousin and is a member of a Facebook group, Odin’s Warriors, which is managed by BOLIN.

7. On March 17, 2019, the FBI obtained records relating to a Facebook account utilized by THOMAS ALONZO BOLIN under the alias "Peter Vincent."<sup>1</sup> The Facebook account profile picture depicts the White Pride World Wide banner. White Pride World Wide is listed prominently on the Internet homepage of Stormfront, which is a white supremacist online forum founded by a former Klu Klux Klan leader in Alabama. The Facebook records showed that BOLIN belonged to multiple Facebook groups, such as Skinheads CZ/SK, Odin's Warriors (2! and 2), Volksfront International, and Asatru Folk Assembly. These groups are comprised of members who currently and historically have expressed support for a white supremacist ideology. Between March 10, 2019, and March 19, 2019, BOLIN made statements consistent with white supremacist ideology and made references to the attacks in Christchurch, New Zealand, in several posts and messages on Facebook. The following is a summary of relevant information from the Facebook records:<sup>2</sup>

- a. On March 15, 2019, BOLIN used Facebook to post the following statements:
  - i. "As a people we must accept the old gods and rally around our kin. And fight back against the kikes. islamic filth and the niggers in that order";
  - ii. "Im kinda in the middle of reading that guys manifesto" (referring to the manifesto of the shooter from the Christchurch mosque attacks) and "Brugh I just got done reading the whole thing";

---

<sup>1</sup> On March 21, 2019, FBI Kansas City requested and received from Facebook the return of a voluntary emergency disclosure of subscriber and content information for the account using the Facebook identification number 100022393111719 and user name "Peter Vincent," for the period March 10, 2019, through March 19, 2019. In a message on March 14, 2019, the user stated, "[m]y real name is thomas bolin peter vincent is a character from a horror movie." Subsequently, in an interview on March 30, 2019, BOLIN's girlfriend, who has the initials A.L., confirmed that BOLIN uses a Facebook account in the name of Peter Vincent.

<sup>2</sup> The posts and messages summarized in this affidavit are verbatim and contain various spelling and grammatical errors. Your affiant has not corrected those errors in order to convey the original text to the Court.

iii. “A war is coming being ignorant of it is not protection from it”;  
iv. “Way late for that the invasion happening at the southern border. Or the destruction of our homeland by Islamic trash. Just cause you are a pussy and willing to let it happen dont expect that from me or mine”;

b. On March 15, 2019, BOLIN also posted the two photographs – one with the caption “how muslims see white people,” which depicted a white male pointing a shotgun toward the camera, and one with the caption “how white people see muslims,” which consisted of a still photograph from the Christchurch gunman’s video of the attack showing a long gun being pointed downrange toward a mosque;

c. On March 15, 2019, Ragnar Odinson exchanged messages with BOLIN. BOLIN stated, “Brugh dude killed 40 muslims,” referring to the Christchurch attacks, and Odinson responded with a heart emoji and “Lovely.” BOLIN further stated, “Ya ran up in a mosque with an ar [meaning AR-15],” and Odinson responded, “Lol.” Odinson also shared links to the Christchurch gunman’s manifesto and video of the shooting with a Facebook group, which included BOLIN;

d. On March 15, 2019, BOLIN exchanged Facebook messages with another Facebook user and, in reference to the Christchurch attacks, stated, “there is a war brewing” and “realistically this was a small piece of a bigger picture now we wait for the retaliation”;

e. On March 15, 2019, BOLIN, in a Facebook message to his girlfriend, stated, “Come on they are muslim rats they would gladly do the worse to you or me. it does my heart good to see them run down in front of their sandnigger god” (referring to the Christchurch attacks);

f. On March 16, 2019, BOLIN exchanged a series of Facebook messages with Ragnar Odinson. BOLIN stated that he “wrecked” a car and broke his arm. Odinson responded, “there goes all that shit then.” BOLIN replied, “[o]nly takes one arm to fire a glock.” Odinson

stated, "I guess I'll do this shit my self. I'm not waiting months and months or a week. It was supposed to be done by Halloween";

g. On March 16, 2019, Ragnar Odinson posted, "Words aren't going to help. Violence is the key." BOLIN responded, "Yoooo chill . . . Not on the fed book." Odinson replied, "No fuck are given anymore";

h. On March 17, 2019, BOLIN exchanged Facebook messages with his girlfriend, A.L. BOLIN told her that his cousin (Austin Witkoski who is the Facebook user known as "Ragnar Odinson") had been arrested. A.L. responded, "Well. You guys are probably on a watch list now. Especially with that shooting that just happened [which I believe is a reference to the Christchurch attacks]. That facebook chat you were talking about is probably why they went after him." BOLIN replied, "Nah, ik [meaning "I know"] what happened its so retarded." A.L. responded, "You cant rule it out tho. Especially if you were telling the truth and that guy really qas a part of your group." BOLIN then explained that the arrest happened because Witkowsky's grandfather called the police during an argument;

i. On March 17, 2019, BOLIN, referring to the Christchurch attacks, stated, "Well he wrote a manifesto. What he did was fucked up but politically he is making some points his focus was on the fact that the elites want to kill off the white race and replace us with a demographic they can control better. Which is fairly obvious if you look into it. His solution was extremely radical and misguided but its a good read ill send you the link to it if you want its about a 30 min read"; and

j. On March 18, 2019, BOLIN posted, "Im serious war is comeing. My cousin [a reference to Ragnar Odinson] got dragged out of his house yesterday by a swat team for 100 no reason no charges were filled and they put him on a 72 hour hold."

**BOLIN'S ACCESS TO FIREARMS**

8. On March 12, 2019, BOLIN posted the following photograph to his Facebook page:



9. On March 12, 2019, BOLIN also posted three photographs on his Facebook page, which depicted a total of four handguns.

**BOLIN'S STATEMENTS TO THE FBI ON MARCH 30, 2019**

10. As part of the investigation in this case, members of the Rochester JTTF interviewed BOLIN and his girlfriend A.L. on March 30, 2019. The interviews took place at A.L.'s residence at 4480 Culver Road, Irondequoit, New York. Two members of the investigative team – FBI Special Agent Kevin Black and Task Force Officer (TFO) Scott Hill – approached the front door of the residence and knocked. After BOLIN answered the door, Special Agent Black and TFO Hill identified themselves and asked to speak with BOLIN. BOLIN agreed to speak with them, but would not allow them to enter the residence. BOLIN accompanied Special Agent Black and TFO Hill outside and, due to the fact that it was raining, entered the back seat of one of their vehicles. The vehicle was driven to a parking lot across the street, within view of A.L.'s home. BOLIN remained in the back seat with Special Agent Black, while TFO Hill was positioned in the front passenger seat and TFO Eric Norcross was positioned in the front driver's seat (although he exited the vehicle intermittently to answer telephone calls). At the time of the interview, BOLIN was wearing the same black hooded sweatshirt that was depicted in the photograph from BOLIN's Facebook page, which is set forth in ¶ 8, above.

11. BOLIN was advised throughout the interview, on at least two different occasions, that it was a crime to lie to federal agents in the course of their investigation. In addition, he was advised that he was not under arrest. During the interview, BOLIN stated that his cousin, Austin Witkowski a/k/a Ragnar Odinson, had told him that the FBI would be coming to talk to him (BOLIN) about the Odin's Warriors Facebook group. BOLIN admitted to sharing the video of the Christchurch attacks and the link for the gunman's manifesto. BOLIN stated that he does not

hate Muslims, but wants them out of the country because he believes they are contributing to a corruption of his culture. BOLIN further stated that he never suggested hurting anyone. BOLIN was asked if he possessed any guns. BOLIN admitted to having possessed guns while living in Kansas City, Missouri, but stated that the guns were legal there. BOLIN denied ever possessing a gun while in New York State.

12. In a separate interview, A.L. stated that BOLIN moved to New York in May 2018, and has been residing at 34 Third Avenue, where A.L.'s grandmother also resides. A.L. stated that BOLIN's belongings were at 34 Third Avenue, but stated that BOLIN did not have any firearms or weapons there.

13. On March 30, 2019, an interview was conducted with a person with the initials M.M. at 34 Third Avenue, Greece, New York. M.M., the owner of the residence, stated that she has been renting a bedroom on the second story of the residence to BOLIN for the last eight months. M.M. has a verbal agreement to rent the bedroom to BOLIN for \$200 a month. The room rented by BOLIN can be locked with a key. M.M. maintained a copy of the key because she would periodically enter the bedroom to access a storage closet attached to the bedroom. BOLIN and M.M. are the only people who have a key to BOLIN's bedroom. M.M. has an understanding with BOLIN that she can enter the bedroom whenever she needed to do so. In fact, M.M. has accessed the bedroom six or seven times over the last eight months while BOLIN was not home. M.M. executed a written consent for members of the investigative team to search BOLIN's bedroom and the storage closet.

14. During a subsequent search of BOLIN's bedroom, members of the Rochester JTTF found two boxes of Federal Manufacturing 12-gauge ammunition on the bed. In addition,

they found a red devil mask – which matched the mask depicted in the photograph from BOLIN’s Facebook account, which is set forth in ¶ 8, above – in plain view on a dresser. In the storage closet off the bedroom, FBI Special Agent Matthew Chilbert recovered a black backpack containing a Mossberg, Model 590, 12-gauge shotgun, bearing serial number V0853179, loaded with five rounds of Federal Manufacturing ammunition, and a plastic bag containing additional rounds of shotgun ammunition. M.M. confirmed that the shotgun did not belong to her. Your affiant has examined the front end of the shotgun and determined that it appears to be the same shotgun that is depicted in the photograph from BOLIN’s Facebook account, which is set forth in ¶ 8, above.

15. Based on the evidence recovered in BOLIN’s bedroom and closet, and the photograph posted on his Facebook account on March 12, 2019, your affiant believes that BOLIN knowingly and willfully made a false and fictitious statement when he denied possessing any firearms in New York State. Your affiant further believes that said false and fictitious statement was material to the FBI’s investigation of BOLIN’s potential involvement in violations of federal civil rights and firearms laws.

### **III. CONCLUSION**

16. Based on the foregoing, there is probable cause to believe that THOMAS ALONZO BOLIN has committed a violation of 18 U.S.C. § 1001(a)(2) (materially false statements in relation to a matter within the jurisdiction of the executive branch of the United States government).

Dated: Rochester, New York  
April 3, 2019



ADAM T. PARADOWSKI  
Special Agent  
Federal Bureau of Investigation  
Joint Terrorism Task Force

Subscribed and sworn to before me  
this 3 day of April, 2019.

Marian W. Payson  
HON. MARIAN W. PAYSON  
United States Magistrate Judge  
Western District of New York